

**CAUSE NO. PD-0771-17**

**IN THE COURT OF CRIMINAL APPEALS OF TEXAS** FILED  
COURT OF CRIMINAL APPEALS  
5/23/2018  
DEANA WILLIAMSON, CLERK

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**JOHN CHAMBERS, Petitioner**

**v.**

**STATE OF TEXAS, Respondent**

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On appeal from Cause No. 2015-DCR-268-D from the  
103rd Judicial District Court of Cameron County, Texas

Seeking review of the Thirteenth Court of Appeals'  
Judgment in Cause No. 13-16-00079-CR

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**RESPONDENT'S STATE MOTION FOR LEAVE TO  
FILE ITS RESPONSE OUT OF TIME**

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**TO THE HONORABLE JUSTICES OF SAID COURT:**

Comes now Appellee, The State of Texas, by its County and District Attorney,  
Luis V. Saenz, in this cause, who respectfully requests leave to file its response out  
of time.

**I.**

The State will file its response later today, May 23, 2018, due to unforeseen  
computer problems which delayed the combined formatting of the Brief and  
exhibits. The State would ask this Court to accept the late filed brief in its

consideration of the merits of the case.

### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, State of Texas prays the Court of Appeals will grant its Motion for Leave and allow for the filing of its response out of time, which will be electronically filed with this Court today, May 23, 2013.

**Respectfully submitted**

LUIS V. SAENZ,  
Cameron County and District Attorney

/S/ Samuel Katz  
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### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing State's Motion for Extension of Time to File Late Brief was electronically transmitted to the Applicant's counsel on this the 23rd day of May, 2018.

/S/ Samuel Katz

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Samuel B. Katz  
Assistant District Attorney